



**MCI Communications
Corporation**

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Jonathan B. Sallet
Chief Policy Counsel

ORIGINAL

March 17, 1998

EX PARTE LATE FILED

Mr. Richard Metzger
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: **EX PARTE**
In the Matter of Carrier Identification Codes, CC Docket 92-237

Dear Mr. Metzger:

This letter will alert you to the urgent need to immediately take action to extend the permissive dialing period wherein 3-digit and 4-digit carrier identification codes (CICs) may both be used to access telecommunications services. Several significant events have made it impossible to complete the transition to 4-digit CIC dialing by June 30, 1998, as ordered by the Federal Communications Commission (Commission) last year.¹ The Commission must act quickly to extend the permissive dialing period in order to avoid a transition that will be extremely burdensome for carriers to implement, and will result in great confusion and frustration for consumers.

The Commission is well aware of the importance of 10XXX services to the public. Millions of consumers choose to dial 10XXX numbers to complete interLATA and intraLATA calls because it offers them an option for completion of calls without having to change their primary interexchange carrier (PIC). MCI Telecommunications Corporation (MCI) estimates that \$1.5 billion in 10XXX traffic was carried in 1996 by carriers *other than* AT&T, MCI and Sprint. With 10XXX access, callers may "dial around" the PIC assigned to the originating telephone number, and utilize the services of a competing carrier. Consumers clearly benefit from the sense of freedom that results from the ability, with minimal effort, to choose a carrier other than their PIC to complete a specific call. Consumers also enjoy the ability to sample the services of different carriers without having to change their PIC. If the PIC is experiencing network failure, call blockage, or simply poor transmission quality, 10XXX access to other carriers may be critical to the PIC's subscribers.

¹See Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, Order on Reconsideration, Order on Application For Review, and Second Further Notice of Proposed Rulemaking and Order (rel. Oct. 22, 1997) (Reconsideration Order).

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The 10XXX services now used by consumers are about to undergo a major change. The Commission has ordered that, effective June 30, the familiar 3-digit CICs which have been used by consumers for over a decade, will no longer be available. This alteration to the nation's dialing plan is sweeping and momentous, and its smooth and efficient implementation is crucial to the public interest. In recent weeks, several obstacles to the completion of the transition by June 30 have arisen. Each one, standing alone, requires that the Commission extend the permissive dialing period. Collectively, they demonstrate without a doubt that if the Commission fails to extend the permissive dialing period, the public interest will suffer tremendously.

The first obstacle is associated with the placement in local exchange carriers' (LECs') switches of an intercept recording designed to inform callers that their 3-digit CIC call cannot be completed as dialed. The second obstacle is an outgrowth of a petition for clarification filed by BellSouth Corporation (BellSouth), wherein BellSouth seeks to phase blocking in its switches of 3-digit CIC calls.

The third obstacle to eliminating 3-digit CIC dialing by June 30 is an outgrowth of the Commission having granted several LECs' petitions for extension of the January 1, 1998, date by which they must upgrade their switches to accommodate 4-digit CICs. The granting of these petitions has resulted in a hodge-podge of transition dates across the country, and contradicts the pro-competitive goals of the Act. Each of these three obstacles adversely impacts the industry's ability to complete the transition within the short time period allotted by the Commission, and require that the permissive dialing period be extended until at least February 1999.

On October 22, the Commission ordered an end to the permissive dialing period during which 3-digit and 4-digit CICs could be used to access telecommunications carriers' services.² The Commission's Reconsideration Order also required all LECs' switches to be equipped to recognize 4-digit CICs by January 1, 1998.³ The Reconsideration Order requires LECs, "at a minimum, [to] offer a standard intercept message beginning on or before June 30, 1998, explaining that a dialing pattern change has occurred and instructing the caller to contact its

²Reconsideration Order, ¶ 25.

³*Id.*, ¶ 25.

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interexchange carrier (IXC) for further information.”⁴ Finally, the Reconsideration Order requires LECs to consult with IXCs to “reach agreement on the content of the message and on the period of time during which the message will be provided.”⁵

I. The Standard Intercept Message

In its Reconsideration Order, the Commission indicated that it would resolve any disputes arising from the parties' inability to reach agreement on the intercept message.⁶ Late last year, MCI and other industry participants began working toward a standard intercept message at the Network Interconnection and Interoperability Forum (NIIF).⁷ In February, the NIIF concluded its discussion of the intercept message issue. At that meeting, the NIIF adopt the following intercept message:

"Your call cannot be completed as dialed. If you dialed a 5 digit code, it has changed. Please redial adding a one and a zero before the 5 digit code, or for assistance contact the carrier you are trying to use."

MCI objects to the NIIF proposed recording. MCI's proposed intercept recording is as follows:

"If you dialed a 5 digit code, it has changed. Please redial adding a one and a zero before the 5 digit code, or for assistance contact the carrier you are trying to use."

MCI's proposal demonstrates that the inclusion of the language, "your call cannot be completed as dialed," is unnecessary and wasteful. If a caller dials a 3-digit CIC after the permissive dialing period ends, s/he will immediately know that the call cannot be completed as dialed, because the

⁴*Id.*, ¶ 26.

⁵*Id.*

⁶*Id.*

⁷The NIIF is a forum of the Carrier Liaison Committee and is sponsored by the Alliance For Telecommunications Industry Solutions.

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call will not complete. There is thus no reason to state the obvious in the form of superfluous language after this point has been made. MCI's proposal accomplishes the Commission's stated goals of explaining to callers that a dialing pattern change has occurred, and instructing them to contact the carrier for further information.⁸ The proposed NIIF recording uses unnecessary language that discourages callers at the outset, and imposes a significant anti-competitive hardship on IXC's. MCI's proposed recording, on the other hand, accomplishes the Commission's stated goals without the use of anti-competitive language.

By approving the NIIF recording, the LECs are intentionally attempting to discourage consumers from accessing IXC services using 3-digit CICs. If used, the recording will be especially harmful to competition in the intraLATA toll market because the Regional Bell Operating Companies (RBOCs) are not required to provide intraLATA toll dialing parity until February 1999.⁹ Insisting on this anti-competitive standard intercept message, is simply their way of attempting to perpetuate their monopolies as long as possible, to the detriment of the public interest.

Another concern regarding the standard intercept message involves the LECs' application of Special Information Tones (SITs.) MCI's research shows that a high number of callers typically hang up immediately upon hearing a SIT.¹⁰ These callers do not wait to hear any recorded announcement. Use of a SIT in this context would thus be devastating to services provided by IXC's and other dial around carriers. It is extremely important then that the Commission specifically order that all LECs must provide the standard intercept message without SITs.

There is no good reason for the intercept message to contain SITs or the sentence, "your call cannot be completed as dialed." Absent that language and the tones, the message

⁸See Reconsideration Order, ¶ 26.

⁹See 47 U.S.C. § 271(e)(1). The Commission's intraLATA toll dialing parity rules, which had required RBOCs to provide dialing parity in an accelerated fashion, were invalidated by the United States Court of Appeals for the Eighth Circuit. See *Public Utilities Commission of California, et. al. v. FCC*, 124 F.3d 934 (1997).

¹⁰Special Information Tones are tones used by carriers in their switches in conjunction with some recorded announcements.

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accomplishes all of the Commission's goals, without also serving to further confuse and frustrate consumers. It also furthers the Commission's objective to "advance the pro-competitive objectives of the [Act]."¹¹ The Commission should resolve this impasse by ordering the removal from the intercept recording of the extraneous and unnecessary language, and should order that SITs cannot be used.

II. BellSouth's Petition For Reconsideration

On November 23, BellSouth petitioned the Commission for reconsideration and/or clarification of the Commission's Reconsideration Order. In its petition, BellSouth notified the Commission that it was unable to initiate blocking in its switches of 3-digit CIC calls on a "flash cut" basis.¹² Instead, according to BellSouth, at least 60 days are required to transition its switches, on a phased approach, from acceptance of 3-digit CICs to acceptance of 4-digit CICs exclusively.¹³ BellSouth specifically asked the Commission to allow it to begin its phased implementation on June 30, 1998, so it would not interfere with the permissive dialing period.¹⁴ The Commission has yet to act on BellSouth's petition.

Several carriers, including AT&T Corp. (AT&T), Southwestern Bell Companies (SBC) MCI and U S WEST, Inc. (U S WEST), commented on BellSouth's petition. MCI stated that it was not opposed to BellSouth's phased approach, so long as it is conditioned by the Commission on the following: (1) BellSouth (and any similarly situated LEC) must publicly disclose pre-implementation and quality control plans at least 45 days before the scheduled blocking in a switch of 3-digit CIC calls; and (2) BellSouth (and any similarly situated LEC) must begin the phased transition process on June 30, 1998, and not before.¹⁵ Stated another way, the fact that BellSouth requires 60 days to transition its switches to 4-digit CICs should not shorten the permissive dialing period.

¹¹Reconsideration Order, ¶ 4.

¹²BellSouth Petition, p. 2.

¹³*Id.*

¹⁴*Id.*

¹⁵*See* MCI Comments, pp. 3-5.

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In its comments, U S WEST stated that like BellSouth, it is unable to block 3-digit CICs in its switches on a "flash-cut" basis.¹⁶ U S WEST, however, asserts that the Reconsideration Order extending the permissive dialing period need not be clarified in order for U S WEST and any other similarly situated carrier to phase-in 3-digit CIC blocking.¹⁷ U S WEST also asserts that because the "truth" of the education campaigns undertaken by carriers will "prove itself in,"¹⁸ phased blocking of 3-digit CICs is "of little regulatory, market or industry consequence,"¹⁹ and that carriers would not be disadvantaged by a phase-in process.²⁰

U S WEST is incorrect. Without pre-implementation and quality control plans, U S WEST, BellSouth and other similarly situated LECs could simply transition end offices at their leisure, without notifying MCI of dates and transition times, and without disclosing important details of the transition. This would leave MCI without the ability to plan for the transition within its own network, and would cause substantial disruption to MCI's educational efforts throughout the country. Thus, U S WEST's assertion that LECs need not publicly disclose implementation plans threatens the ability of IXC's to effectively communicate the details of the transition to their customers.

AT&T opposed BellSouth's Petition, asserting that if BellSouth needs two months to phase-in 3-digit CIC blocking, it should be required to do so beginning May 1, a full two months before the currently scheduled end to the permissive dialing period.²¹ Thus, AT&T's position is that even if it is impossible for a LEC to flash-cut 3-digit CIC blocking, a LEC that needs to phase implementation should be allowed to invade the permissive dialing period, and begin refusing to accept correctly dialed calls using 3-digit CICs prior to the end of the permissive dialing period, June 30, 1998. If the Commission were to accept AT&T's position, each carrier

¹⁶Comments of U S WEST, p. 2.

¹⁷*Id.*

¹⁸*Id.*, p. 3.

¹⁹*Id.*

²⁰*Id.*, p.5.

²¹*See* Opposition of AT&T, p. 3.

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that needed to phase implementation would be in violation of the Reconsideration Order once it blocked a 3-digit CIC call before June 30, 1998. AT&T's position is thus unacceptable.

AT&T correctly points out that the Commission's intent in its Reconsideration Order was to "put all carriers at parity by requiring identical dialing patterns."²² AT&T's position, however, is that in the face of the possibility that nationwide dialing parity may not be possible, the Commission should do nothing. If it is true, as asserted by U S WEST and BellSouth, that flash-cut blocking of 3-digit CICs is impossible, dialing parity vis-a-vis all carriers is also impossible. Adoption of AT&T's approach to allow individual carriers to begin blocking 3-digit CIC calls whenever and wherever they feel it is appropriate, within the permissive dialing period, would cause irreparable harm to MCI, confuse the public and violate the Commission's Reconsideration Order.

SBC claims to have similar issues as BellSouth with respect to implementation of this dialing change.²³ Like BellSouth, SBC claims that an unspecified period of time is needed to convert each switch to block 3-digit CICs.²⁴ As a result, SBC supports BellSouth's Petition, on the condition that blocking can begin only after June 30, the end of the permissive dialing period.²⁵ Thus, yet another carrier has a different set of circumstances and its own opinion about how this transition should occur.

The Commission has yet to rule on BellSouth's petition. Meanwhile, the June 30, 1998, end to the permissive dialing period is fast approaching. Regardless of the specific action taken by the Commission on BellSouth's petition, the Commission should also extend the permissive dialing period to allow the industry to take account of the various LEC implementation capabilities and plans in order to facilitate a smooth end to the permissive dialing period.²⁶ Presently, the industry has reached an impasse with respect to the intercept message recording. Moreover, several LECs have begun to implement the transition using whatever internal plans

²²*Id.*, p. 4.

²³Comments of SBC Companies, p. 2.

²⁴*Id.*

²⁵*Id.*

²⁶*See* Reply Comments of MCI, pp. 6-7, 9.

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they choose.²⁷ The Commission should act quickly to extend the transition period and prohibit LECs from taking anti-competitive actions that unlawfully erode IXCs' market share, and confuse and frustrate those members of the public that wish to use IXCs' services. Simply stated, absent an extension, this transition cannot be accomplished without serious adverse consequences to the public and IXCs.

The importance of the Commission taking immediate action to better control this transition by extending the permissive dialing period is further highlighted by recent actions taken by GTE. On March 3, 1998, GTE sent a letter to VarTech Communications Group (VarTech), and possibly other carriers, seeking approval to transition from 3-digit to 4-digit CIC dialing before the end of the permissive dialing period. This letter, which is attached as Exhibit C, solicits concurrence in GTE's plan to complete the transition to 4-digit CICs by June 30. If implemented, GTE's plan would clearly violate the Commission's Reconsideration Order, which orders an end to the permissive dialing period on June 30, and not before.

III. Extension of the January 1, 1998, Implementation Date

In addition to the challenges highlighted above, several other occurrences point out the need for more time to successfully implement the transition in a fashion that furthers the public interest. First, the Commission has recently granted several LECs' requests to extend beyond January 1, 1998, the date by which those LECs must be able to accept 4-digit CICs.²⁸ Those

²⁷The fact that additional time is needed to resolve these complex and detailed issues is also underscored by Ameritech's and Bell Atlantic's announcements of their projected transition plans. Ameritech's plan, which violates the Commission Order, is to cease accepting 3-digit CIC calls on June 29. *See* Report No. NCD-114, attached as Exhibit A. Bell Atlantic's plan, on the other hand, is to cease accepting 3-digit CICs on June 30. *See* Report No. NCD-113, attached as Exhibit B. Although just a day's difference, this obvious discrepancy is illustrative of the level of confusion and disagreement now present in the industry with respect to this transition.

²⁸*See, e.g.,* Order, Petitions For Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-53, 97-56, 97-46, 97-51, 97-54, 97-55, 97-47, 97-48, 97-49, 97-50 (rel. Dec. 3, 1997), ¶¶ 15-30 (granting extensions of time for several LECs to accept 4-digit CICs, and further, indicating that it would consider future requests for extension of time); Order, Petitions For Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-52, 97-58, 97-57, 97-62, 97-61 (rel. December 15, 1997), ¶ 24 (Hager Order) (granting extensions of time until August 31, 1998 (Silver Star Telephone Co., Inc.) and January 1, 1999 (Hager Telecom Co.), and ordering that

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extensions affect thousands of access lines across the country, and serve to extend the January 1, 1998, transition date to several different dates, from April 1998 to January 1999. The Commission's granting of those extensions has created a patchwork of different transition dates throughout the country, and thus further complicated the logistics associated with the transition from 3-digit to 4-digit CIC dialing.

In one very troubling instance, the Commission granted Hager Telecom, Inc.'s (Hager's), petition for an extension of time until January 1, 1999. In so doing, it ordered Hager to:

on June 30, 1998, indicate that callers will not be able to reach
their long distance carriers through access code dialing until
January 1, 1999.²⁹

The fact that the Commission is granting a variety of waivers of the national dialing plan rules, thus forcing the implementation of this transition in an unpredictable and non-uniform fashion, is reason enough to extend the permissive dialing period. The above additional Commission order that Hager's customers be told that they simply cannot reach the carrier of their choice until January 1999 not only adversely impacts the ability of the industry to make a smooth transition to nationwide 4-digit CIC dialing, but also directly violates the Commission's Reconsideration Order, and is contrary to the pro-competitive goals of the Act.

both LECs install an intercept message advising callers that they "will not be able to reach their long distance carriers through access code dialing until January 1, 1999"). *See also* Order, Petitions For Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-74, 97-63, 97-78, 97-75, 97-66, 97-67, 97-65, 97-68, 97-73, 97-70, 97-72, 97-76, 97-64, 97-71, 97-69 (rel. December 24, 1997) (granting several petitions for extensions of time); Order, Request for Waiver of Five-Digit Carrier Access Code (CAC) Dialing During the Permissive Dialing Period, NSD File No. 97-85 (rel. Jan. 28, 1998) (granting the request of Border To Border Communications, Inc., request for waiver of the requirement that it accept 3-digit CICs between January 1, 1998, and June 30, 1998, and further, instructing Border To Border to provide an intercept message educating callers about the need to dial a 7-digit carrier access code, rather than a 5-digit one, for the remainder of the permissive dialing period.)

²⁹Hager Order, ¶ 24.

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Rather than continue along the path of this patchwork of changes and transitional details in the small amount of time allotted by the Commission, the better approach is to extend the permissive dialing period until at least February 28, 1999. Such an extension is clearly in the public interest. There is no good reason not to extend the permissive dialing period, particularly in light of the complicated issues presently being addressed in the industry with respect to this significant change to the national dialing plan.

With an extended permissive dialing period, all LECs will have completed the necessary upgrades to accept 4-digit CICs and the public interest will be better served through promotion of a smoother transition to the new national dialing plan. An extension will minimize consumer confusion, frustration and inconvenience and ensure that the transition occurs in a competitively neutral fashion. It will also further the Commission's stated goal of advancing the pro-competitive goals of the Act.

Sincerely,



Jonathan B. Sallet

cc: Honorable William Kennard, Chairman
Commissioner Susan Ness
Commissioner Furtchgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani
Richard Welch
John Nakahata
Jim Casserly
Paul Gallant
Geraldine Matise
Kris Monteith
Marion Gordon

EXHIBIT A



PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION
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WASHINGTON, D.C. 20554

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COMMON CARRIER BUREAU NETWORK CHANGE NOTIFICATION

Report No. NCD-114

January 9, 1998

By the Chief, Network Services Division, Common Carrier Bureau:

Re: NETWORK CHANGE NOTIFICATION RECEIVED

Ameritech has filed public notice of network change, per 47 C.F.R. § 51.329(a). Upon initial review the filing appears to be complete. See 47 C.F.R. § 51.325 through 51.335. Specific network change information is attached. FCC file number(s) NDF97-480 and NDF97-481 are assigned for reference purposes.

Network changes identified herein shall not be implemented within six months of the date they were filed with the Commission. See 47 C.F.R. § 51.331.

The original filing is available for inspection and copying at the Network Services Division Reference Room, 2000 M Street, NW, Suite 220, Washington, DC 20554.

Additional information is available from Ms. Ginny Kennedy, Network Services Division, at (202) 418-2328.

Incumbent Local Exchange Carrier (ILEC):

Ameritech Operating Companies
c/o Legal Department, 4H82,
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196

ILEC Disclosure Number: 97-12-01

FCC File: NDF97-480

Title: Ameritech's Multichannel Video Service

Contact person: Terry McCarthy 847-248-5067

Implementation: June 1998

Locations:

Offered throughout the major metropolitan areas within the Ameritech region.

Description:

Performance enhancements have been made to the existing service and an interface for Serial Component Video has been added.

Impact:

No impact upon existing AMVS customers. Provides for a new optional interface.

Technical documentation:

Ameritech publication AM TR-NIS-000130, Issue 2, October 1997.

Ameritech
Technical Information Resource Management
2000 West Ameritech Center Drive, 3A09F
Hoffman Estates, IL 60196
847-248-4328

ILEC Disclosure Number: 97-12-02

FCC File: NDF97-481

Title: End of Permissive Dialing for Five Digit CACs

Contact person: Brian Baldwin 847-248-5324

Implementation: June 30, 1998

Locations:

All exchanges served by Ameritech

Description:

Consistent with the FCC's Order on Reconsideration in its Docket 92-237, the permissive dialing period for five-digit Carrier Access codes (CACs) i.e., 10XXX, will come to an end beginning June 30, 1998. After that date, customers wishing to have their toll calls carried by an Interexchange Carrier (IXC) other than that which they previously had pre-subscribed to, must dial the new, seven-digit (101-XXXX) CAC.

Impact:

Beginning June 30, 1998, customers must dial a seven-digit CAC (i.e., 101-XXXX) in order to reach a non-presubscribed IXC. Customers that continue to dial a five digit CAC (i.e., 10-XXX) will be forwarded to an announcement, which informs them that their call cannot be completed as dialed, and provides new dialing instructions.

Reference:

FCC Order on Reconsideration, CC Docket 920237, released October 22, 1997.

Internet website: www.fcc.gov/Bureaus/Common_Carrier/Orders

-FCC-

EXHIBIT B



PUBLIC NOTICE

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COMMON CARRIER BUREAU NETWORK CHANGE NOTIFICATION

Report No. NCD-113

January 9, 1998

By the Chief, Network Services Division, Common Carrier Bureau:

Re: NETWORK CHANGE NOTIFICATION RECEIVED

Bell Atlantic has filed public notice of network change, per 47 C.F.R. § 51.329(a). Upon initial review the filing appears to be complete. See 47 C.F.R. § 51.325 through 51.335. Specific network change information is attached. FCC file number NDF97-479 is assigned for reference purposes.

Network changes identified herein shall not be implemented within six months of the date they were filed with the Commission. See 47 C.F.R. § 51.331.

The original filing is available for inspection and copying at the Network Services Division Reference Room, 2000 M Street, NW, Suite 220, Washington, DC 20554.

Additional information is available from Ms. Ginny Kennedy, Network Services Division, at (202) 418-2328.

Name: Carrier Identification Codes (CIC)&Carrier Access Code(CAC) Changes

Description:

Carrier Access Codes (CAC) will be converted from five-digits to seven-digits and Carrier Identification Codes (CICs) from three-digits to four-digits in accordance with the FCC Order CC: Docket No.92-237.

CICs are numeric codes that enable local exchange providers (LECs), as providers of interexchange access services, to identify access customers in order to bill and route traffic to such customers. In addition a carrier's CIC, which is the suffix of that carrier's CAC, enables callers to reach any carrier from any telephone. A caller may dial a seven-digit CAC format (101-XXXX) to reach a carrier, with the last four-digits (XXXX) representing that carrier's unique four-digit CIC. The current three-digit CICs are being expanded to four-digits by prefixing them with a zero (0).

The industry is currently operating in a permissive dialing mode - a period in which end-users may dial either 10-XXX or 101-0XXX (XXX or 0XXX indicates CIC) for those carriers now assigned a three-digit CIC. Mandatory dialing will require callers to dial a seven-digit CAC (10-XXXX). Carriers will be required to send and receive only four-digit CICs beginning with the Mandatory Dialing Period.

Impact:

Expansion to four-digit CICs is necessary to meet Industry demands for additional CICs.

Date and location:

The permissive dialing period will end on June 30, 1998. Mandatory dialing period will begin on July 1, 1998. This change will be available throughout Bell Atlantic.

Reference: TR-NWT-001050 Expansion of Carrier Identification Code Capacity for Feature Group D (FGD): Bellcore

Bellcore document can be obtained from the following address:

Bellcore Customer Service
8 Corporate Place Room 3A184
Piscataway, NJ 08854
Phone: 1-800-521-2673 (USA)
1-908-699-5800(Outside USA)

Bell Atlantic Contact:

Susan Fox
Product Manager - Switched Access Services
2980 Fairview Park Drive
10th Floor
Falls Church, VA 22042
703 645-1298

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EXHIBIT C



**GTE Telephone
Operations**

One Tampa City Center
201 N. Franklin Street
P.O. Box 110
Tampa, FL 33601-0110

March 3, 1998

Ms. Christina McConnell
VerTel Telecom, Inc.
3200 W. Pleasant Run Road
Lancaster, Texas, 75146

Dear Ms. McConnell:

Due to the FCC mandated conversion of 3 digit to 4 digit CIC codes, all carriers will need to be converted prior to the effective date of 7/1/98. In an effort to simplify the conversion, GTE would like to offer the following solution which will alleviate the need for ASRs from our DXC customers:

- DXCs must convert their end of trunks to GTE offices to the new 4 digit CIC.
- DXCs will notify GTE when trunk conversions on their end is completed.
- GTE will systematically convert all DXC trunks found in each office.

To make this conversion a success, GTE will need a letter of concurrence from your company verifying that this method of conversion will be satisfactory as soon as possible due to the time constraints. Once your company accepts GTE's proposal, a coordinated effort will be organized between myself and a designated representative from your company to insure a smooth transition. I will notify your company in advance of dates which conversions will occur and verification of completion of end office conversion.

I hope that this method of CIC conversion will be found satisfactory by your company. If you need any additional information, please contact me at 813/273-2973.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert D. Yow".

Robert D. Yow
Service Manager - OCC

Enclosure

c: D Jones - TXD193JD - Irving, TX